

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CITY OF WESTLAND POLICE AND FIRE
RETIREMENT SYSTEM, *Individually and On
Behalf of All Others Similarly Situated,*

x : Civil Action No.: 12 CIV 0256

: CLASS ACTION

Plaintiff,

vs.

METLIFE INC., C. ROBERT HENRIKSON,
WILLIAM J. WHEELER, PETER M. CARLSON,
STEVEN A. KANDARIAN and WILLIAM J.
MULLANEY,

x

Defendants.

DECLARATION OF REED R. KATHREIN IN SUPPORT OF MOTION TO APPOINT
IRONWORKERS' DISTRICT COUNCIL (PHILADELPHIA & VICINITY) PENSION & BENEFIT
PLANS AS LEAD PLAINTIFF AND TO APPROVE THE SELECTION OF LEAD COUNSEL

I, REED R. KATHREIN , declare as follows:

1. I am a Partner at the law firm Hagens Berman Sobol Shapiro LLP, counsel for Ironworkers' District Council (Philadelphia & Vicinity) Penion & Benefit Plans ("IWDC"). I am an attorney licensed to practice law in the States of California, Illinois and Florida. I make this Declaration in support of IWDC's motion for: (1) appointment as Lead Plaintiff; and (2) approval of their selection of Co-Lead Counsel for the Class.

2. Attached as Exhibits A through D hereto are true and correct copies of the following documents:

Exhibit A: Notice of Pendency of *City of Westland Police and Fire Retirement System v. Metlife, Inc., et al*, Case No. 1:12-cv-0256-LAK, published on January 12, 2012;

Exhibit B: Certification of IWDC;

Exhibit C: Charts of Transactions and losses of IWDC;

Exhibit D: The firm résumé of Hagens Berman Sobol Shapiro LLP; and

Exhibit E: The firm résumé of Saltz Mongeluzzi Narrett & Bendesky P.C. ("SMBB").

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 12th day of March, 2012 at Berkeley, California.

/s/ Reed R. Kathrein
REED R. KATHREIN

CERTIFICATE OF SERVICE

I hereby certify that I am the ECF User whose ID and password are being used to electronically file the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the e-mail addresses registered, as denoted on the attached Electronic Mail Notice List, and I hereby certify that I have mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

/s/ Jason A. Zweig

JASON A. ZWEIG